



WASHINGTON STATE
GAMBLING COMMISSION

Field Operation Rule Interpretation

Question: May a card room employee at a house-banked card room work as both a dealer and floor supervisor during the same shift? Yes

CITE: WAC 230-40-815 Administrative and Accounting Control Structure-Organization—House-banking

SUMMARY

Issue:

House-banked card room operators would like the flexibility of having dealers also serve as a floor supervisor during the same shift. A person serving as both a dealer and floor supervisor is typically known as dual rater. Operators typically use a dual rater when a card room employee serves a dealer for part of their shift and later serves as a supervisor when more tables are opened. It may also occur when there is an extra dealer available to fill in for breaks for the dealer and supervisor or when the supervisor is called away from the pit.

Reasoning:

WAC 230-40-815 requires the segregation of incompatible functions so that no employee is in a position to perpetrate and conceal errors or irregularities in the normal course of his or her duties. Dealer and supervisors both sign on fill and credit slips, request for fill and credit slips, and table inventory slips. In order for proper segregation of duties, a card room employee may not sign as both a dealer and supervisor on the same form. A card room employee signing as a dealer on the table inventory slip at the opening of the table and also signing on the table inventory slip as a supervisor at the closing of the table is not a lack of segregation of duties and therefore acceptable.

Decision:

A card room employee may serve as both a dealer and supervisor during the same shift as long as they are not signing forms in both capacities that would create a lack of segregation of duties. Commission staff recommends card room operators separately record in their work schedule the hours the card room employee is assigned to serve as a dealer from the hours assigned as a floor supervisor. For example, John Smith is scheduled to work 8-12 as a dealer and 12-4 as floor supervisor.

Approved:

Cally Cass
Cally Cass, Assistant Director
Washington State Gambling Commission

Date:

6/24/05